

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BRIAN F. HYNES; VENDOR ASSISTANCE  
PROGRAM, LLC; BLUE STONE FINANCE,  
LLC; BLUESTONE CAPITAL MARKETS, LLC;  
GREYSAND FINANCE, LLC; and GREYSAND  
CAPITAL, LLC;

Plaintiffs,

v.

FORDE & O'MEARA LLP; MICHAEL K.  
FORDE; LEONARD TRIAL LAWYERS LLC;  
and MICHAEL I. LEONARD;

Defendants.

Case No: 1:24-cv-02467

Hon. Jorge L. Alfonso

**JOINT STATUS REPORT**

For their Joint Status Report, the parties, by and through their respective counsel, hereby jointly present the following:

**I. Pleadings Status**

On June 10, 2024, Plaintiffs filed a Second Amended Verified Complaint (Dkt. #89), asserting the following causes of action:

Count	Cause of Action	Parties at Issue
I	Defamation <i>Per Se</i>	Plaintiffs vs. Forde
II	Defamation <i>Per Quod</i>	Plaintiffs vs. Forde
III	False Light Invasion of Privacy	Plaintiffs vs. Forde
IV	Tortious Interference with Business Expectancy	Plaintiffs vs. Forde
V	Defamation <i>Per Se</i>	Plaintiffs vs. Leonard
VI	Defamation <i>Per Quod</i>	Plaintiffs vs. Leonard
VII	False Light Invasion of Privacy	Plaintiffs vs. Leonard
VIII	Tortious Interference with Business Expectancy	Plaintiffs vs. Leonard
IX	Civil Conspiracy	Plaintiffs vs. Forde and Leonard
X	<i>Respondeat Superior</i>	Plaintiffs vs. Forde & O'Meara LLP
XI	<i>Respondeat Superior</i>	Plaintiffs vs. Leonard Trial Lawyers LLC

Defendants request that the Court grant them until July 22, 2024, to respond to the Second Amended Complaint. Plaintiffs have no objection to this request.

## **II. Discovery Status**

In the Minute Entry entered on April 24, 2024 (Dkt. #88), the Court denied as moot Defendants' Joint Motion to Stay Discovery until the District Court of Puerto Rico ruled on their pending dispositive motions (Dkt. #72). The Court further held that discovery is in abeyance until the parties are at issue.

Now that an amended pleading is on file, the parties agree to exchange Rule 26(a)(1) disclosures within fourteen (14) days after Defendants file their respective responses to the operative complaint.

## **III. Likelihood of Settlement**

After Defendants and their counsel have an opportunity to review and discuss the Second Amended Verified Complaint, the parties will confer to discuss the potential for early resolution. The parties do not request a settlement conference at this time.

Respectfully submitted,

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